APPENDIX A
SCOPE OF WORK

SCOPE OF WORK IDEAL COOPERAGE SITE

A PURPOSE

The objectives of this removal plan includes the removal/disposal of drums presently on the site, implementation of a subsurface investigation to identify burned drums and collection of surface and subsurface soil samples to determine the presence of contamination. The site activities will be conducted in accordance will all applicable state and federal laws and in accordance with U.S. EPA and NJDEP requirements.
Respondents shall submit an Operation Plan, as required in Paragraph 28 of Administrative Order II - CERCLA -_____, which provides for the implementation of the tasks described below. Respondents shall also prepare site management, sampling and analysis, Health and Safety, Quality Assistance/Quality Control, and Emergency Response/Contingency Plans which incorporate the elements presented in the following sections.

B SITE PREPARATION

The site preparation of the Operations Plan shall include the following activities:

1. Delineation of work zones including, "hot zone", staging areas, burning areas, decontamination area, etc. Clearing of debris to establish work space may be necessary.

2. Set-up of support trailers (Decontamination, office and equipment), as necessary.

3. Establishment of emergency response stations in close proximity to active work areas in "clean zone". Stations should be equipped with emergency first aid supplies, fire fighting equipment and spill response materials.

4. Installation of barriers (e.g., barricades, high vis fence, tape, etc.) to restrict entry of unauthorized personnel to areas established in Item 1., above.

C DRUM REMOVAL AND SUBSURFACE INVESTIGATION

1. DRUM REMOVAL/DISPOSAL

Drum removal/disposal activities shall be conducted in conformance with the EPA guidance document entitled, "Drum Handling Practices at Hazardous Waste Sites" (EPA 600/2-86-013). The Drum Removal/Disposal portion of the Operations Plan shall include the following activities:

A) Staging, overpacking and bulking drums will be conducted in conformance with 49 CFR Parts 173.178 and 179. Measures will be taken to ensure the security and stability of drum staging and storage areas background air monitoring must be conducted during drum activities.

B) Sampling and Analysis: All drums containing solid and or liquid materials will be sampled and analyzed for compatibility. Drums containing incompatible materials will be segregated as appropriate. Once waste streams have been determined, composites of the drums from each waste stream will be collected for disposal analysis. Empty drums must be disposed at a RCRA permitted facility, in compliance with all state and federal regulations.

C) Manifesting, labelling and packaging are to be provided in accordance with appropriate RCRA and DOT regulations, during the transportation and disposal of wastes and drums.

2. SURFACE AND SUBSURFACE INVESTIGATION

Test pits will be excavated on site to determine if drums are burned on the property, and to identify contamination in surface and subsurface soil.

A) Six (6) test pits must be excavated to a depth of 16 feet. The locations of the test pits will be field determined based on surficial drum locations and site conditions.

B) Collection of soil samples from test pit locations at depths of 0-0.5 feet, 8-8.5 feet and 15.5-16.0 feet and or from areas where drums/contamination is identified.

C) Soil samples collected for analysis, will be analyzed for Target Compound list (TCC) pakemeters.

D) Procedures for excavating must comply with applicable OSHA standards (29 CFR PArts 1926. 650-652).

D) SAMPLING AND ANALYSIS PLAN

The Sampling and Analysis Plan (SAP) will include the analytical procedures used during the testing for compatibility and disposal characteristics and the Target Compound List parameters. The SAP shall be completed in accordance with applicable methods as specified in the following EPA published documents: "Guidance Document for Cleanup of Surface Tank and Drum Sites" (May 1985); Characterization of Hazardous Waste Site - A Methods Manual Volume I- Site Characterization, and Volume II - Available Sampling Methods (August 1985 and December 1984) "Preparation of Soil Sampling Protocol; Techniques and Strategies" (August 1985) and Test Methods for Evaluating Solid Wastes" (SW-846) (November, 1986, or as revised or updated).

E) QUALITY ASSURANCE/QUALITY CONTROL

Quality Assurance/Quality Control (QA/QC) Plan will be developed which shall satisfy the following requirements.

1. The QA/QC Plan shall be completed in accordance with Section 10 of SW-846, and "Guidance for Preparation of Combined Work/Quality Assurance Project Plans for Environmental Monitoring" (U.S. EPA, Office of Water Regulations and Standards, May, 1984);

2. The Respondent shall use QA/QC procedures in accordance with the QA/QC Plan submitted and approved by EPA pursuant to this Order and shall use standard EPA Chain of Custody procedures, as set forth in the National Enforcement Investigations Center Policies and the National Enforcement Investigations Center Manual for the Evidence Audit, published in September, 1981, and SW-846, for all sample collection and analysis activities conducted pursuant to this Order.

3. If performance of any subsequent phase of the work required by this Order requires alteration of the QA/QC Plan, Respondents shall submit to EPA for review and approval proposed amendments to the QA/QC Plan.

F) DEMOBILIZATION

The Demobilization portion of the Operations Plan shall provide for the demobilizaton of all equipment and personnel upon completion of on-site activities in accordance with the schedule provided in the Administrative Order.

G) SCHEDULE

The Operations Plan shall include a schedule for performance of the work required in the Administrative Order. The schedule shall provide for completion of the work within forty days of EPA approval of the Operations Plan.

H) MANAGEMENT PLAN

The management plan shall identify personnel involved in implementing the work under the Administrative Order. Identification shall include but not be limited to, the persons name, job title, qualifications and responsibilities. The plan shall also address the following: definition of relationships and responsibilities of personnel with respect to each task to be implemented; interfacing, coordinating and reporting to EPA; coordination of subcontractors, if any, and description of health and safety requirements and responsibilities.

I) HEALTH AND SAFETY PLANS

The Health and Safety Plan (HSP) shall be developed in accordance with OSHA requirements listed in 29 CFR 1910.120. The HSP shall at a minimum include the following:

1. The name of the site health and safety officer and the names of key personnel, as well as, alternates responsible for site safety and health.

2. A health and safety risk analysis for existing site conditions and for each task required to implement the Administrative Order.

3. Employee training.

4. Specification of personnel protective equipment to be used by personnel for each of the tasks and operations to be conducted.

5. Medical surveillance requirements.

6. A description of the frequency and types of air monitoring, personnel monitoring, and environmental sampling techniques and instrumentation to be used.

7. Site control measures.

8. Standard operating procedures for the site.

9. Work Zones and Decontamination procedures.

10. A contingency plan.

11. Entry procedures for confined spaces.

12. Health and safety procedures for sampling and overpacking drums.

13. Site maps, a detailed site description and previous sampling data and field reports.

14. An emergency plan, as described below.

15. Record keeping and reporting requirements.

Guidance to be consulted in developing the HSP should include, but not necessarily be limited to the following:

American National Standards, Practices for Respiratory Protection (American National Standards Institute, 1980).

Guidance Manual for Superfund Activities, Volumes 1-9 (National Institute for Occupational Safety and Health, 1985).

Occupational Health Guidelines for Chemical Hazards (National Institute for Occupational Safety and Health, 1985).

Safety Manual for Hazardous Waste Site Investigations (U.S. EPA 1979).

Interim Standard Operating Safety Guides (U.S. EPA, 1982).

Occupational Safety and Health Guidance Manual for Hazardous Waste Site Activities (NIOSH/OSHA/USCC/USEPA, 1985).

NIOSH/OSHA Pocket Guide to Chemical Hazards (National Institute for Occupational Safety and Health, 1985).

U.S. EPA Memorandum entitled, "Standard Operating Safety Guides" (U.S. EPA, July 1988).

J) EMERGENCY RESPONSE/CONTINGENCY PLAN

The Emergency Response/Contingency Plan shall include the following:

1. The name of the Emergency Coordinator and the names of key personnel, as well as, alternates responsible for site assessing and responding to emergency situations.

2. Employee training.

3. Emergency response equipment and warning systems.

4. Emergency procedures, including but not limited to, spill response, personal injury, air monitoring contingencies and evacuation.

5. Identification of Emergency Response Agencies and procedures for notifying such Agencies.

6. Site control measures.

7. Record keeping and reporting requirements.

K) COMMUNITY RELATIONS PLAN:

EPA will develop the Community Relations Plan. The Community Relations Plan shall designate the tasks which the Respondent shall be responsible for.

L) REMOVAL ACTION REPORT

The Removal Action Report shall be submitted to EPA for review and approval within sixty days of EPA approval of the Operations Plan, pursuant to Paragraph 30 of the Administrative Order. The report will summarize results of the field activities and include recommendations for additional site work if necessary.